

**REMARKS**

In view of the foregoing amendments and following remarks, Applicants respectfully request reconsideration and withdrawal of the outstanding Office Action rejections. Claim 1-31 have been amended to place the claims in better condition for examination. No new matter has been added.

Claims 1, 2, 3, 5 and 7 stand rejected under 35 U.S.C. 112, second paragraph. Claims 1, 2, 3, 5 and 7 have been amended to obviate the outstanding rejection. Applicants respectfully submit that page 4 (last paragraph) of the present specification describes the polyimide resin as being part of the dielectric layer. Hence, the nature of the relationship between the polyimide resin and the various metal layers must be viewed from the perspective that the polyimide resin is an integral part of the dielectric layer.

Claims 1, 4, 6 and 8-25 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Hayakawa (U.S. Patent No. 5,685,968). Applicants respectfully submit that the Examiner has not provided adequate motivation to one of skill in the art in reading the disclosure of Hayakawa to arrive at the present invention. The Examiner asserts that the dielectric Ta<sub>2</sub>N film of Hayakawa has surface defects and the electrode base layer fills up the pores and surface defects as it is electroplated thereon (see column 5, lines 41-67 of Hayakawa). Applicants submit that in Hayakawa, there is no teaching or suggestion of using polyimides for sealing a surface. Moreover, there is no teaching or suggestion in Hayakawa to use polyimides for any purpose whatsoever.

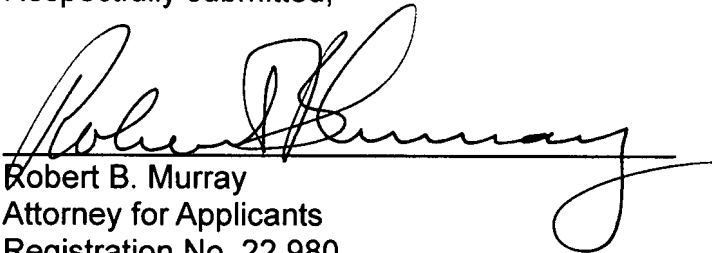
Applicants submit that the present invention is directed to sealing the pit-like defective portions of an inorganic-oxide sputtered film with a polyimide resin. Page 4 of the present specification clearly states that by sealing the pit-like defective portions of an inorganic-oxide sputtered film with a polyimide resin, a dielectric layer is formed. In other words, the dielectric layer of the present invention comprises both an inorganic-oxide sputtered film and a polyimide resin.

Hayakawa teaches using the lower electrode base layer to cure defective surfaces of the final dielectric layer. Accordingly, Applicants respectfully submit that there is no motivation found in Hayakawa to cure pit-like surface defects in an inorganic-oxide sputtered film by sealing the defects with a polyimide resin to thereby form a dielectric layer that comprises both an inorganic-oxide sputtered film and a polyimide seal thereon. Rather, Hayakawa teaches that the lower electrode base layer is employed to cure surface defects of the dielectric layer. However, Hayakawa does not teach or suggest that the lower electrode base layer becomes integral with the dielectric layer, whereas the present invention teaches curing surface defects with a polyimide resin that ultimately becomes integral with the dielectric layer.

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the outstanding Office Action rejections. The present claims are believed to be in condition for allowance. Early and favorable action is awaited.

Respectfully submitted,

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